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25 UNITED STATES DISTRICT COURT
26 FOR THE NORTHERN DISTRICT OF CALIFORNIA
27 SAN FRANCISCO DIVISION

28 AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity
as President of the United States, et al.,

Defendants.

Case No. 3:25-cv-03698-SI

**DECLARATION OF DANIELLE
LEONARD**

DECLARATION OF DANIELLE LEONARD

I, Danielle Leonard, declare as follows:

1. I am a member in good standing of the State Bar of California and the bar of this Court. I represent all Union and Non-Profit Organization Plaintiffs in this action. This declaration is based on my personal knowledge, information, and belief.

2. On May 19, 2025 Plaintiffs' counsel received an email from counsel for Defendants submitting ARRs to the Court pursuant to the Court's May 15 Order. That email stated in part:

The Court's Order directed Defendants to provide, as to ARRs for certain components: "(1) the versions of ARRs submitted to OMB and OPM and (2) the versions of ARRs approved by OMB and/or OPM." As you will observe, we have attached only one version of each AARP. That is because, for these components, there is only one version. OPM and OMB have not "approved" ARRs for these components in the sense of formally signing off on them; nor have they required the submission of any additional versions, and these components have not submitted any other versions. Components do not need to receive any such "approval" from OMB and OPM, nor to wait for input from OMB or OPM, before they begin work on further studying and potentially implementing the proposals and recommendations set forth in their submitted ARRs.

3. I emailed defense counsel and requested to meet and confer regarding the representations in that paragraph. On May 20, 2025, counsel for the parties met and conferred regarding Plaintiffs' questions regarding Defendants' representation to the Court that no documents fall within category (2) of the Court's order ("the versions of ARRs approved by OMB and/or OPM"). I specifically asked Defendants' counsel whether they were representing that no approval in any form had been given for these documents in whole or any part. Counsel for Defendants explained their position was that they fully complied with the Court's order by submitting the single version of the AARP documents, whether or not they had been approved, and that they were making no factual representations in this case, including as to whether these ARRs had been approved. Counsel then declined to answer further questions regarding the basis for their factual statements in the email to the Court and Plaintiffs regarding OMB/OPM approvals or the lack thereof.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed May 20, 2025, in Oakland, California.

/s/ Danielle Leonard
Danielle Leonard